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8 *Travis Fratis, Aaron Harroun, Daniel Henson,*  
*Christopher Jones, Adam Laxalt, Valaree Olivas,*  
9 *Brian Sandoval, Robert Schofield, Holly Skulstad,*  
*Ronald Waldo, Corrections Officer White and*  
10 *State of Nevada ex rel. Board of Prison Commissioners*

11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 ROY TROST aka DAISY MEADOWS,

14 Plaintiff,

15 v.

16 STATE OF NEVADA, ex rel., BOARD OF  
PRISON COMMISSIONERS; BRIAN  
17 SANDOVAL, In his official capacity; ADAM  
LAXALT, in his official capacity; BARBARA  
18 CEGAVSKE, in her official capacity; JAMES  
DZURENDA, in his official capacity; ISIDRO  
19 BACA in his individual capacity; ROBERT  
BANNISTER, in his individual and official  
20 capacity; REMO ARANAS, in his individual  
and official capacities; ROBERT  
SCHOFIELD, in his individual capacity;  
21 STEPHEN DANIELS, in his individual  
capacity; VALAREE OLIVAS, in her  
22 individual Capacity; DWAYNE BAZE in his  
individual and official capacities; RONALD  
23 RALDO in his individual and official  
capacities; CHRISTOPHER JONES in his  
24 individual capacity; CORRECTIONS  
OFFICER WHITE in his individual capacity;  
25 DANIEL HENSON, in his individual  
capacity; TRAVIS BENNETT in his  
26 individual capacity; AARON HARROUN, in  
his individual capacity; TRAVIS FRATIS, in  
27 his individual capacity; and HOLLY  
SKULSTAD, in her individual capacity;

28 Defendants.

Case No. 3:14-cv-00611-MMD-WGC

**STIPULATION AND ORDER FOR 45-  
DAY STAY FOR SETTLEMENT  
NEGOTIATIONS**

1 The parties to this action, by their respective counsel, having agreed to the  
2 following, and for good cause shown, hereby stipulate and agree to stay this case for forty-  
3 five (45) days for settlement negotiations. The parties have agreed to the general terms  
4 of settlement.

5 To that end, the parties have exchanged the first draft of the settlement documents  
6 and are in negotiations over the wording and execution of certain non-monetary terms,  
7 given the interstate nature of Plaintiff's housing and evolving medical and legal stances  
8 in regards to the central issues of the case, and the format of certain clauses to ensure an  
9 enforceable contract.

10 The stay period will commence the day following the entry of this Court's order in  
11 this regard. The parties further stipulate that, in the event that they are unable to  
12 negotiate a resolution to this litigation, the parties will submit a revised scheduling order,  
13 accounting for a 45-day extension of time and the time spent negotiating the settlement.  
14 The parties have agreed to the primary and material terms of settlement.

15 This Request for stay is not sought for any improper purpose or other purpose of  
16 delay. Rather, it is sought by the parties solely for the purpose of facilitating settlement.  
17 The parties recognize and submit that they are cognizant of the age of this case and  
18 Magistrate Judge Cobb's admonishments regarding the same at the previous case  
19 conference.

20 Moreover, a stay is necessary because counsel for Plaintiff has been in an ongoing,  
21 multi-week preliminary injunction hearing in Eighth Judicial District Court for *Serenity*  
22 *Wellness Center, LLC, et al. v. State of Nevada Department of Taxation* (Case No. A-19-  
23 786962-B), *MM Development Company, Inc., et al. v. State of Nevada, Department of*  
24 *Taxation* (Case No. A-18-785818-W), and *ETW Management Group LLC v. Nevada Dept*  
25 *of Taxation* (Case No. A-19-787004-B) which began on May 24, 2019.

26 The parties note that the previous stay ended on May 31, 2019 and this order  
27 would set forth a new stay. The parties remain available for a teleconference should the  
28 Court have any questions or concerns on the settlement or as to reasons for delay.

1 The parties wish to avoid any unnecessary litigation costs that could arise in  
2 conjunction with litigating this matter before the Court in association with the above  
3 deadlines. For these reasons, the parties request that this Court enter its order staying  
4 this case for forty-five (45) days.

5 DATED this 7th day of June, 2019.

DATED this 7th day of June, 2019.

6 **NEVADA ATTORNEY GENERAL**

**MCLEATCHIE LAW**

7 /s/ Frank A. Toddre II  
8 Frank A. Toddre II, NBN 11474  
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701 East Bridger Ave., Suite 520  
Las Vegas, NV 89101  
*Attorneys for Plaintiff*

14 IT IS SO ORDERED.

15 DATED: June 7, 2019.

16   
17 UNITED STATES MAGISTRATE JUDGE  
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